

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BAYSHORE CAPITAL ADVISORS, LLC, BCA  
ALTERNATIVE INCOME FUND, LP, and  
ROCKING T RANCH, LLLP,

Plaintiffs,

v.

CREATIVE WEALTH MEDIA FINANCE CORP.,  
BRON CREATIVE CORP., BRON CREATIVE  
USA CORP., BRON STUDIOS, INC., BRON  
STUDIOS USA, INC., HUDSON VALLEY  
WEALTH MANAGEMENT, INC., JASON  
CLOTH, AARON L. GILBERT, CHRISTOPHER  
CONOVER, DAVID K. JONAS, and DOES 1-21,

Defendants.

Case No. 22-cv-1105-KMK

Hon. Kenneth M. Karas

**NOTICE OF MOTION  
TO DISMISS**

**PLEASE TAKE NOTICE THAT**, upon the Declaration of Benjamin Margulis, dated August 26, 2022, and the exhibits attached thereto, and the accompanying memorandum of law, Defendants BRON Studios, Inc, BRON Studios USA, Inc., and Aaron L. Gilbert, by their attorneys, will respectfully move this Court before the Honorable Kenneth M. Karas, at courtroom 521 of the Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse, 300 Quarropas St., White Plains, New York, 10601, at a date and time to be set by the Court, for an order dismissing Plaintiffs' First Amended Complaint (ECF 54) for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2) or in the alternative *forum non conveniens*, and for failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6). Oppositions and replies are to be filed pursuant to the Court's Motion Scheduling Order of July 15, 2022 (ECF 66).

Dated: August 26, 2022  
New York, New York

/s/ Joshua I. Schiller  
Joshua I. Schiller  
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BRON Studios USA, Inc., and Aaron L.  
Gilbert*